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**Davis Polk** 

Dana M. Seshens +1 212 450 4855 dana.seshens@davispolk.com davispolk.com Davis Polk & Wardwell LLP 450 Lexington Avenue New York, NY 10017

September 20, 2022

Re: Nexstar Media Inc. v. Comcast Cable Communications, LLC, No. 1:21-cv-06860-JGK

## **VIA ECF**

The Honorable John G. Koeltl United States District Court for the Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

Dear Judge Koeltl:

We represent Defendant, Counterclaim Plaintiff, and Third-Party Plaintiff Comcast Cable Communications, LLC ("Comcast") in the above-referenced action. Pursuant to Rule VI.A.2. of Your Honor's Individual Practices and Paragraph III.4.b. of the Stipulated Protective Order (ECF No. 135) entered in this action, we write to request permission to file under temporary seal unredacted versions of Comcast's pre-motion conference letters concerning motions to compel discovery as against Plaintiff and Counterclaim Defendant Nexstar Media Inc. ("Nexstar") and Third-Party Defendant Mission Broadcasting, Inc. ("Mission") (together, the "Letters"), both of which we submit contemporaneously herewith.

Comcast's Letters refer to or reflect certain information that has previously been sealed in this case, such as specific provisions of the relevant contracts and the parties' pre-litigation correspondence. Comcast itself does not currently seek permanent confidential treatment of such information. But Comcast requests that the Letters be filed under temporary seal (and with certain redactions made to the publicly filed versions consistent with previous sealing requests) to afford Nexstar and Mission the opportunity to file any application(s) for permanent sealing and/or redaction should they choose to do so. Simultaneously with the filing of this letter, Comcast is informing counsel for Nexstar and Mission of its submission of this letter-request, and, pursuant to Rule VI.A.2., is notifying the same of their obligation to file any letter(s) requesting permanent sealing and/or redaction within three days.

As required by Rule VI.A.2., Comcast submits herewith: (i) unredacted copies of the Letters, which, if Comcast's application were granted, would be placed under temporary seal; and (ii) proposed public versions of the Letters.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Dana M. Seshens

Dana M. Seshens

cc: All counsel of record (via ECF)

APPLICATION GRANTED SO ORDERED

The College John G. Koeltl, U.S.D.J.